UNITED TECHNOLOGIES PRATT&WHITNEY

400 Main Street
East Hartford, Connecticut 06108

July 7, 1989

Mr. George Dews
Senior Environmental Engineer
Hazardous Waste Management Section
Department of Environmental Protection
165 Capitol Avenue
Hartford, CT 06106

Mr. Stephen Yee
Environmental Engineer
Waste Management Division
US EPA
JFK Federal Building
Room 1903
Boston, MA 02203

RE: Burn-Zol Hazardous Waste Incinerator Closure Plan

Dear Sirs:

I am pleased to submit a draft closure plan for the Burn-Zol hazardous waste incinerator located at Pratt & Whitney's facility in East Hartford, CT. This plan represents our efforts following the latest round of agency comments dated 4/27/89 and our recent meeting to discuss those comments held on 6/7/89.

As agreed upon during our meeting of 6/7/89, this letter has been prepared to aid you in your review of the enclosed closure plan. I have responded to each of your comments item by item, similar to Pratt & Whitney's correspondence dated 5/22/89. If a response to a specific comment was incorporated completely the response will simply read as "Done". Comments that required more substantial revisions to the existing closure plan will be explained in further detail.

The following is our response to individual agency comments as addressed in the draft closure plan:

1. In Section 1.0 INTRODUCTION

   a. A job specific Site Health and Safety Plan has been prepared and is included as Appendix A. The plan addresses general operating procedures during incinerator closure activities and outlines the personal protection strategies available for all working party members.

   b. Done

   c. Done

d. See the Site Health and Safety Plan in Appendix A.

e.

1. Reference to "decontamination process" has been eliminated.

2. The only fire/explosion potential identified in the closure plan submitted on 5/2/88 was the blended oil line flushing using jet fuel as a solvent. It is understood that we agreed upon a single plant tap water rinse for the blended oil lines thereby eliminating the use of jet fuel. Therefore, we have excluded wording referring to fire/explosion potential.

3. The phrase "appropriate mechanisms" has been omitted. We have referenced emergency response procedures outlined in Pratt & Whitney's Environmental Compliance Manual.

f. Done

2. In Section 2.0 FACILITY DESCRIPTION

a. Done

3. In Section 3.0 INCINERATOR DESCRIPTION

a. The definition proposed for incinerator train was agreed upon at the meeting. This definition has been incorporated in the first paragraph in Section 3.0.

b. The incinerator train diagram has been corrected to read 21'3".

c.

1. Done

2. The second paragraph in Section 3.0 addresses the incinerator train in its original layout and its current layout. Sketch layouts depicting these two conditions have been prepared and included as Appendix B, Figures 2 and 3.

d. "B&G" refers to the commercial trade name "Bell and Gossett". This reference is not necessary and has been omitted.

e.

1. Done

f. Done

g. Done

4.

a.- c. Subparagraph 3 has been completely rewritten to address these comments.

d.& e. The transporter and landfill disposal facility have not been named at this time. Refer to Subparagraph 7 referencing these items.

f. Please refer to Subparagraph 3 for clarification on this comment.

5.

a. Please refer to Subparagraph 4.

b. Safety clothing is addressed in the Site Health and Safety Plan - Appendix A.

c. No

d. Decontamination procedures for the concrete pad and concrete pit are specified in Subparagraphs 4 & 5. Verification sampling and analysis of these areas are outlined in Sections 10.0 and 11.0.

6. Done - Refer to Subparagraph 9.

7.

a. Reference to the Part B application has been omitted as agreed upon in the meeting (6/7/89).

b. This Subparagraph has been rewritten. There is no reference to the word "structure".

c. Done

d. Done

e. Done

6. In Section 8.0 MAXIMUM WASTE INVENTORY

a. Section 8.0 has been rewritten. The phrase "will be handled appropriately" has been omitted.

b. During the test burns all scrubber waters were collected, analyzed and treated at Pratt & Whitney's Concentrated Waste Treatment Plant. There are no analytical results to include as an appendix.

c. Done

7. In Section 9.0 CLOSURE COST ESTIMATE

a.- d. This section has been completely revised to reflect current market conditions in 1989. Recent proposals for both field services and laboratory services form the basis for the estimate.

8. In Section 9.0 SAMPLING PROCEDURES

a. Done

b. Done

c. A laboratory has not been selected at this time. The last paragraph of Section 9.0 specifies that the designated laboratory will be approved by the State of Connecticut.

d. Done - Refer to the Subparagraph referring to concrete chip sampling.

e. We have proposed hydroblasting of the ceiling in the vicinity of the incinerator train in lieu of wipe sampling. The following items are presented as a justification for this alternative:

- We consider the concrete pad which forms the footing of the combustion chambers and the concrete pit that houses the air pollution control equipment the only areas that could have potentially been exposed to incinerator operations. The concrete pad is considered due to its close proximity to the waste feed injection nozzles. The concrete pit is considered because the caustic scrubber waters were held in a tank within the pit. Both of the areas have a potential for contamination from incinerator test burns due to contact by an aqueous media. There are no other areas that could be contacted by contaminated aqueous media; therefore, these areas are not considered.

- The incinerator exhaust system was designed to operate under an induced draft system indicating a negative pressure environment. This design precludes any forced emissions from the ductwork to the exhaust stack. Therefore, the ceiling has been eliminated from consideration as a potentially contacted area.

- Our interpretation of incinerator closure is a partial closure within the Concentrated Waste Treatment Plant focussing on the incinerator train and associated waste feed lines. The enclosed draft closure plan addresses this objective comprehensively with all proposed activities being fully protective of human health and the environment and in compliance with 40 CFR Subpart 265.351.

The building currently houses an active wax/solvent mixture storage tank which functions as hazardous waste storage tank under RCRA interim status. There are no plans to close this operation and future plans for the building following incinerator closure include additional non-permitted (<90 day storage) hazardous waste storage. If the building is included in the incinerator closure we feel there is a strong potential for elements to apply as outlined in 40 CFR Subpart 265.113(b)(1&2). Therefore, we have limited our inclusion of the building to the concrete pad, the concrete pit, and hydroblasting the ceiling in the vicinity of the incinerator train.

- Our research into wipe sampling for the parameters listed in Section 11.0 Table 2 has resulted in no precedent to follow regarding sample methodology. This coupled with a poorly documented history of sample efficiency has lead us to choose hydroblasting as the alternative of choice. The presence of the active wax/solvent tank within the same building has a potential to cross contaminate adjacent ceiling areas with the volatile organic compounds.

- We have been successful in identifying closure performance standards for waste feed line rinsate samples and concrete chip samples. These closure performance standards will enable the decontamination effort to proceed to completion maintaining complete protection of human health and the environment. A significant potential for the delay of decontamination efforts exists due to the absence of closure performance standards for wipe samples.

f. All incinerator train components and hardware will be dismantled, stored and treated as hazardous waste. No decontamination is therefore required.

g. Done - Refer to Appendix E.

9. In Section 11.0 TESTING AND DETERMINATION PROCEDURES

a. All ash/residue, or rinsate will be collected, stored and treated as hazardous waste unless analytical testing demonstrates a nonhazardous condition. There are presently no plans to analyze these wastes; however, the option is available following all appropriate RCRA waste characterization procedures.

b. It is understood that Table 2 in Section 11.0 is acceptable as an analytical parameter list for aqueous and concrete chip samples.

c. Done

d. Done

e. Done

f. No laboratory has been identified -- the only criteria stated in this section is that the laboratory be approved by the State of Connecticut.

10.

a. Section 12.0 has been rewritten to reflect this requirement.

11. Photographs of the incinerator train components are being prepared for the final submittal. It is anticipated that a total of five photographs will be submitted in Appendix B Plates 1-5.

Thank you for your time in review of the enclosed draft closure plan. Should you have any questions feel free to call me at (203)565-2016.

Sincerely,

Scott Singer
Senior Environmental Engineer

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Encl.

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